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*Attorneys for Plaintiff Lyft, Inc.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

LYFT, INC.

Plaintiff,

v.

AGIS SOFTWARE DEVELOPMENT LLC,

Defendant.

Case No. 5:21-cv-04653-BLF

**DECLARATION OF BETHANY R.  
SALPIETRA IN SUPPORT OF  
PLAINTIFF LYFT, INC.'S REPLY IN  
SUPPORT OF ITS MOTION FOR LEAVE  
TO FILE FIRST AMENDED  
COMPLAINT**

Date: July 28, 2022  
Time: 9:00 A.M.  
Judge: Hon. Beth Labson Freeman  
Trial Date: October 16, 2023  
Courtroom: 3, Fifth Floor

1 I, Bethany R. Salpietra, declare as follows:

2 1. I am over the age of 21 and am fully competent to make this declaration. I have  
3 personal knowledge of all facts recited herein and state that such facts are true and correct to my  
4 knowledge or information and belief, and, if called upon to do so, I would testify competently about  
5 them.

6 2. I am duly admitted to practice law in the State of Texas and before this Court. I am  
7 counsel at the law firm of Baker Botts L.L.P., 2001 Ross Avenue, Suite 900, Dallas, TX 75201, and  
8 I represent Lyft, Inc. (“Lyft”) in the above-captioned action.

9 3. I have reviewed and complied with the Northern District of California’s Civil L.R.  
10 (dated November 1, 2021).

11 4. I make this Declaration in support of Plaintiff’s Reply in Support of its Motion for  
12 Leave to File First Amended Complaint (“FAC”).

13 5. I met and conferred with counsel for AGIS Software Development LLC (“AGIS  
14 Software”) on April 15, 2022.

15 6. At the April 15, 2022 meet and confer, counsel for AGIS Software explained that  
16 AGIS, Inc. has cooperated in previous patent infringement litigations brought by AGIS Software  
17 but has refused to similarly cooperate in the above-captioned action. In particular, counsel for AGIS  
18 Software, who is also counsel for AGIS, Inc., explained that AGIS Inc. previously provided its  
19 documents to its counsel for production in previous AGIS Software litigations without a subpoena.

20 7. Attached as Exhibit 13 are excerpts from a true and correct copy of the March 22,  
21 2022 Deposition Tr. of Thomas Meriam, which AGIS Software designated as highly confidential.  
22 Lyft takes no position with regard to this designation.

23 8. Attached as Exhibit 14 is a true and correct copy of a screen capture showing the  
24 2021 Public Information Report for “AGIS Software Development LLC” available via the Texas  
25 Comptroller of Public Accounts website at <https://mycpa.cpa.state.tx.us/coa/coaSearchBtn>.

26 9. Attached as Exhibit 15 is a true and correct copy of a Florida Department of State  
27 webpage showing the results of an entity name search for “Advanced Ground Information Systems,  
28 Inc.”, available at

1 [https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490&aggregateId=domp-p04000099549-b00d4e06-db2d-4557-9f40-bc08b21327e9&searchTerm=Advanced%20Ground%20Information%20Systems%2C%20Inc.&listNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490)  
2 [&directionType=Initial&searchNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%2](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490&aggregateId=domp-p04000099549-b00d4e06-db2d-4557-9f40-bc08b21327e9&searchTerm=Advanced%20Ground%20Information%20Systems%2C%20Inc.&listNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490)  
3 [0P040000995490&aggregateId=domp-p04000099549-b00d4e06-db2d-4557-9f40-](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490&aggregateId=domp-p04000099549-b00d4e06-db2d-4557-9f40-bc08b21327e9&searchTerm=Advanced%20Ground%20Information%20Systems%2C%20Inc.&listNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490)  
4 [bc08b21327e9&searchTerm=Advanced%20Ground%20Information%20Systems%2C%20Inc.&li](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490&aggregateId=domp-p04000099549-b00d4e06-db2d-4557-9f40-bc08b21327e9&searchTerm=Advanced%20Ground%20Information%20Systems%2C%20Inc.&listNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490)  
5 [stNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490.](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490&aggregateId=domp-p04000099549-b00d4e06-db2d-4557-9f40-bc08b21327e9&searchTerm=Advanced%20Ground%20Information%20Systems%2C%20Inc.&listNameOrder=ADVANCEDGROUNDINFORMATIONSYSTE%20P040000995490)

6 10. Attached as Exhibit 16 is a true and correct copy of a Florida Department of State  
7 webpage showing the results of an entity name search for “AGIS Holdings, Inc.”, available at  
8 [https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=AGISHOLDINGS%20P170000428680&aggregateId=domp-p17000042868-04d3c28f-1fa3-48b8-897a-f40c78b7e601&searchTerm=AGIS%20Holdings%2C%20Inc.&listNameOrder=AGISHOLDING)  
9 [&directionType=Initial&searchNameOrder=AGISHOLDINGS%20P170000428680&aggregateId](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=AGISHOLDINGS%20P170000428680&aggregateId=domp-p17000042868-04d3c28f-1fa3-48b8-897a-f40c78b7e601&searchTerm=AGIS%20Holdings%2C%20Inc.&listNameOrder=AGISHOLDING)  
10 [=domp-p17000042868-04d3c28f-1fa3-48b8-897a-](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=AGISHOLDINGS%20P170000428680&aggregateId=domp-p17000042868-04d3c28f-1fa3-48b8-897a-f40c78b7e601&searchTerm=AGIS%20Holdings%2C%20Inc.&listNameOrder=AGISHOLDING)  
11 [f40c78b7e601&searchTerm=AGIS%20Holdings%2C%20Inc.&listNameOrder=AGISHOLDING](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=AGISHOLDINGS%20P170000428680&aggregateId=domp-p17000042868-04d3c28f-1fa3-48b8-897a-f40c78b7e601&searchTerm=AGIS%20Holdings%2C%20Inc.&listNameOrder=AGISHOLDING)  
12 [S%20P170000428680.](https://search.sunbiz.org/Inquiry/CorporationSearch/SearchResultDetail?inquirytype=EntityName&directionType=Initial&searchNameOrder=AGISHOLDINGS%20P170000428680&aggregateId=domp-p17000042868-04d3c28f-1fa3-48b8-897a-f40c78b7e601&searchTerm=AGIS%20Holdings%2C%20Inc.&listNameOrder=AGISHOLDING)

13 Executed on this 19th day of April, 2022 at Dallas, Texas, County of Dallas. I declare under  
14 penalty of perjury under the laws of the United States of America that the foregoing is true and  
15 correct to the best of my knowledge.

16 Dated: April 19, 2022

17 Respectfully submitted,

18 By: /s/ Bethany R. Salpietra  
19 Bethany R. Salpietra

20 *Attorneys for Plaintiff Lyft, Inc.*

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